

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case:2:18-cr-20027

Judge: Berg, Terrence G.

MJ: Majzoub, Mona K.

Filed: 01-17-2018 At 10:09 AM

INDI USA v. RAMAMOORTHY (SO)

18 U.S.C. § 2242(2)

v.

PRABHU RAMAMOORTHY,

Defendant.

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

18 U.S.C. § 2242(2) – *Sexual Abuse*

On or about January 3, 2018, within the special aircraft jurisdiction of the United States while on board Spirit Airlines Flight 788, which originated from Las Vegas, Nevada, and landed at the Detroit Metropolitan Airport, in the Eastern District of Michigan, the defendant, PRABHU RAMAMOORTHY, knowingly caused an adult woman (Adult Victim-1 or AV-1) to engage in a sexual act (to wit: the penetration of AV-1's genital opening by RAMAMOORTHY's hand or finger with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person), at a time when AV-1 was, as the defendant knew, incapable

of appraising the nature of the conduct and physically incapable of communicating unwillingness to engage in the sexual act, in violation of 18 U.S.C. § 2242(2).

THIS IS A TRUE BILL

s/Grand Jury Foreperson  
Grand Jury Foreperson

MATTHEW SCHNEIDER  
United States Attorney

s/Matthew Roth  
Matthew Roth  
Chief, General Crimes Unit  
Assistant United States Attorney  
211 West Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9186

s/Amanda Jawad  
Amanda Jawad  
Assistant United States Attorney  
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Dated: January 17, 2018

Case:2:18-cr-20027  
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<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> <i>AL</i>

**Case Title:** USA v. Prabhu Ramamoorthy

**County where offense occurred :** Wayne

**Check One:**    ☒ **Felony**                      ☐ **Misdemeanor**                      ☐ **Petty**

       Indictment/        Information -- **no** prior complaint.  
  ✓   Indictment/        Information -- based upon prior complaint [Case number: 18-mj-30003  
       Indictment/        Information -- based upon LCrR 57.10 (d) [Complete Superseding section below].

## Superseding Case Information

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

**Prior Complaint (if applicable)**

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

January 17, 2018  
Date

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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.